

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

ANNUAL COMPLIANCE REVIEW, 2022

Docket No. ACR2022

**RESPONSES OF THE UNITED STATES POSTAL SERVICE TO
QUESTIONS 11-15 OF CHAIRMAN'S INFORMATION REQUEST NO. 13**

The United States Postal Service hereby provides its responses to the above-listed questions of Chairman's Information Request No. 13, issued on February 10, 2023. Each question is stated verbatim and followed by the response. It should be noted that Questions 1-10 and 16 are the subject of a pending Motion for Reconsideration filed on February 16, 2023.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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11. Please refer to the *FY 2022 Annual Report* which refers to the reconstitution of the Postal Service Board of Governors' (Governors) Election Mail Committee to "to oversee, review, and monitor the Postal Service's preparations for the 2022 primary and general elections[.]" *FY 2022 Annual Report* at 35. Please provide a table containing the nationwide volume of the following categories of mail, with monthly volumes both in the aggregate and disaggregated by product:

- a. Political Mail¹ that the Postal Service delivered in each month of FY 2022; and
- b. Election Mail² that the Postal Service delivered in each month of FY 2022.

If any such data cannot be provided, please explain.

RESPONSE:

Please note: The Postal Service Board of Governors' Election Mail Committee's oversight is focused on Election Mail and not Political Mail.

- a. Political Mail volume by month, mail class, and shape for FY 2022:

Last Scan Month	Marketing Political Mail Volume			Marketing Political Mail Volume Total	First-Class Political Mail Volume			First-Class Political Mail Volume Total	Total Political Mail Volume
	Letter	Flat	Card		Letter	Card	Flat		
10/1/2021	83,603,194	57,502,830		141,106,024	2,756,130	962,899	458,370	4,177,399	145,283,423
11/1/2021	20,494,512	5,638,458		26,132,970	1,283,575	120,809	123,429	1,527,813	27,660,783
12/1/2021	22,077,627	3,611,727		25,689,354	1,113,668	87,964	31,047	1,232,679	26,922,033
1/1/2022	26,575,125	11,064,475		37,639,600	1,088,414	138,996	14,568	1,241,978	38,881,578
2/1/2022	46,493,456	25,585,016	390	72,078,862	821,635	343,172	37,764	1,202,571	73,281,433
3/1/2022	29,778,007	13,730,336	44,103	43,552,446	681,098	212,097	81,701	974,896	44,527,342
4/1/2022	60,416,424	47,497,172	39,649	107,953,245	1,557,221	787,844	165,795	2,510,860	110,464,105
5/1/2022	124,556,669	160,366,006	58,616	284,981,291	1,953,093	1,076,003	453,607	3,482,703	288,463,994
6/1/2022	72,754,492	86,355,288	6,241	159,116,021	2,308,683	828,756	307,820	3,445,259	162,561,280
7/1/2022	96,311,595	63,082,782	72,414	159,466,791	1,647,319	1,013,935	514,931	3,176,185	162,642,976
8/1/2022	56,017,037	42,045,688	10,070	98,072,795	2,656,006	688,370	501,782	3,846,158	101,918,953
9/1/2022	193,648,934	275,398,150	15,809	469,062,893	1,973,946	278,028	949,108	3,201,082	472,263,975

¹ "Political Mail" refers to any mailpiece sent for political campaign purposes by a registered candidate, a campaign committee, or a committee of a political party to promote candidates, referendums, or campaigns.

² "Election Mail" refers to items such as ballots, voter registration cards, and absentee applications that an authorized election official creates for voters.

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Total Political Mail Volume	832,727,072	791,877,928	247,292	1,624,852,292	19,840,788	6,538,873	3,639,922	30,019,583	1,654,871,875
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b. Election Mail volume by month, mail class, and mail shape for FY 2022:

Last Scan Month	Marketing Election Mail Volume			Marketing Election Mail Volume Total	First-Class Election Mail Volume			First-Class Election Mail Volume Total	Total Election Mail Volume
	Letter	Flat	Card		Letter	Card	Flat		
10/1/2021	19,926,454	1,317,106		21,243,560	8,387,280	959,431	50,683	9,397,394	30,640,954
11/1/2021	1,038,227	146,361		1,184,588	2,737,448	99,234	29,494	2,866,176	4,050,764
12/1/2021	942,725	134,371		1,077,096	3,471,234	453,207	27,165	3,951,606	5,028,702
1/1/2022	4,980,275	948,871		5,929,146	4,614,928	376,433	32,171	5,023,532	10,952,678
2/1/2022	2,848,320	299,967		3,148,287	7,474,547	1,022,515	39,233	8,536,295	11,684,582
3/1/2022	7,441,931	1,107,562	3,993	8,553,486	5,131,484	1,103,180	281,354	6,516,018	15,069,504
4/1/2022	10,887,045	13,286,216		24,173,261	5,999,553	1,117,904	47,553	7,165,010	31,338,271
5/1/2022	45,718,212	17,920,155		63,638,367	12,514,716	1,957,355	130,469	14,602,540	78,240,907
6/1/2022	10,364,121	1,362,268		11,726,389	9,861,860	1,925,941	69,923	11,857,724	23,584,113
7/1/2022	12,532,754	322,857	6	12,855,617	12,250,864	1,271,974	40,715	13,563,553	26,419,170
8/1/2022	18,550,828	265,448		18,816,276	7,784,417	904,926	35,314	8,724,657	27,540,933
9/1/2022	28,097,365	23,527,588		51,624,953	4,980,072	253,255	39,521	5,272,848	56,897,801
Total Election Mail Volume	163,328,257	60,638,770	3,999	223,971,026	85,208,403	11,445,355	823,595	97,477,353	321,448,379

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- 12.** For each product used for Election Mail during FY 2022, please provide volumes, attributable costs, revenues, cost coverage, and contribution for that product, disaggregated by Election Mail and non-Election Mail. If any such data cannot be provided, please explain.

RESPONSE:

The Postal Service does not separately track revenue, attributable cost, and financial information for Election Mail and non-Election Mail. Nonetheless, for the purposes of responding to the question, the Postal Service has developed approximation estimates for Election Mail and non-Election Mail by product that are displayed in the table below.

The Election Mail volumes in the table were obtained from scans captured on automated sortation equipment that provided the class (First-Class and Marketing Mail) and shape (cards, letters, and flats). For outgoing Election Mail, the volumes were supplemented with *PostalOne!* data to determine the products within each mail class, where the Election Mail indicator on the postage statement was flagged. The unit revenues from the *PostalOne!* data led to the assumption that the four relevant products for Election Mail were the following: 1) First-Class Presort Letters and Cards; 2) First-Class Flats; 3) High Density and Saturation Letters; and 4) High Density and Saturation Flats. Additionally, Election Mail also includes ballots returned by voters that would not be included in the previously described *PostalOne!* data. As such, the difference between the First-Class volume obtained from scans on automated equipment and the corresponding volume from *PostalOne!* was assumed to be Ballot Mail and treated as First-Class Single-Piece letters.

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The revenue and attributable cost for Election Mail by product were determined by multiplying the appropriate unit revenue and attributable cost by its Election Mail volume. For First-Class, the appropriate CRA report unit revenue and attributable cost were used. For Marketing Mail, the *PostalOne!* Election Mail commercial and non-profit shares were applied to the Marketing Mail scan volumes captured by the automated equipment to compute the commercial and non-profit volumes for High Density and Saturation Letters and High Density and Saturation Flats and parcels. Subsequently, the relevant unit revenues and unit attributable costs from USPS-FY22-27 were multiplied by the appropriate non-profit volumes to compute Election Mail non-profit revenues and attributable costs by product. Similarly, commercial Election Mail revenues and attributable costs by product were computed by multiplying the relevant commercial unit revenues and unit attributable costs by the appropriate commercial product volume. Finally, the commercial and non-profit revenues, attributable costs, and volumes were summed by product to compute separate totals for Election Mail for High Density and Saturation Letters and High Density and Saturation Flats and Parcels, as displayed in the table. The contribution and cost coverage for both First-Class and Marketing Mail products were computed by taking the difference between revenue and attributable cost and the ratio of revenue to attributable cost, respectively.

The figures for non-Election Mail displayed in the table were computed as the difference between the product level values in the CRA report and the corresponding ones for Election Mail.

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Election Mail	(1)	(2)	(3)	(4)=(2)-(3)	(5)=(2)/(3)
Product	Volume	Revenue	Attributable Cost	Contribution	Cost Coverage
First-Class Single-Piece Letters and Cards	38,501,920	\$ 22,161,735	\$ 14,320,648	\$ 7,841,087	154.8%
First-Class Presort Letters and Cards	58,151,838	\$ 24,109,120	\$ 7,831,530	\$ 16,277,590	307.8%
First-Class Flats	823,595	\$ 1,198,317	\$ 1,103,614	\$ 94,703	108.6%
Total First-Class Election Mail	97,477,353	\$ 47,469,172	\$ 23,255,792	\$ 24,213,380	204.1%
Product	Volume	Revenue	Attributable Cost	Contribution	Cost Coverage
Marketing Mail HD & Saturation Letters	163,332,256	\$ 17,319,564	\$ 17,247,000	\$ 72,564	100.4%
Marketing Mail HD & Saturation Flats and Parcels	60,638,770	\$ 7,005,011	\$ 8,337,490	\$ (1,332,479)	84.0%
Total Marketing Mail Election Mail	223,971,026	\$ 24,324,575	\$ 25,584,490	\$ (1,259,915)	95.1%
Total Election Mail	321,448,379	\$ 71,793,747	\$ 48,840,282	\$ 22,953,465	147.0%
Non-Election Mail	(6)	(7)	(8)	(9)=(7)-(8)	(10)=(7)/(8)
Product	Volume	Revenue	Attributable Cost	Contribution	Cost Coverage
First-Class Single-Piece Letters and Cards	12,779,113,513	\$ 7,293,114,955	\$ 4,761,134,299	\$ 2,531,980,656	153.2%
First-Class Presort Letters and Cards	34,934,149,221	\$ 14,982,679,625	\$ 4,893,689,792	\$ 10,088,989,833	306.2%
First-Class Flats	1,090,192,624	\$ 1,586,211,797	\$ 1,460,854,073	\$ 125,357,724	108.6%
Total First-Class Single-Piece Letters and Cards, Presort Letters and Cards, and Flats non-Election Mail	48,803,455,358	\$ 23,862,006,377	\$ 11,115,678,164	\$ 12,746,328,213	214.7%
Product	Volume	Revenue	Attributable Cost	Contribution	Cost Coverage
Marketing Mail HD & Saturation Letters	5,881,508,484	\$ 1,112,687,376	\$ 552,234,077	\$ 560,453,299	201.5%
Marketing Mail HD & Saturation Flats and Parcels	9,379,932,054	\$ 1,781,173,039	\$ 1,343,418,445	\$ 437,754,594	132.6%
Total Marketing Mail High Density and Saturation Letters and High Density and Saturation Flats and Parcels non-Election Mail	15,261,440,538	\$ 2,893,860,415	\$ 1,895,652,521	\$ 998,207,893	152.7%
Total non-Election Mail	64,064,895,896	\$ 26,755,866,792	\$ 13,011,330,685	\$ 13,744,536,107	205.6%

Sources:

- (1) Barcode scans from automated equipment, Supplemented with Postal One! Data
- (2) CRA Unit Revenue * Volume from (1)
- (3) CRA Unit Attributable Cost * Volume from (1)
- (4) = (2) – (3)
- (5) = (2) / (3)
- (6) CRA Volume - Volume from (1)
- (7) Revenue - Revenue from (2)
- (8) CRA Attributable Cost – Attributable Cost from (3)
- (9) = (7) – (8)
- (10) = (7) / (8)

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13. Please confirm that Postal Service's report entitled 2022 Post-Election Analysis,³ describing the Postal Service's performance related to the 2022 general election, is the Postal Service's most recent and most comprehensive report of its performance related to the 2022 general election.

- a. If not confirmed, please provide any more recent or more comprehensive report that the Postal Service has prepared regarding its performance related to the 2022 general election.
- b. Please refer to the 2022 Post-Election Report which states:

In the November general election, 98.96% of ballots sent by voters to election officials were delivered within three days, 99.82% were delivered within five days, and 99.93% were delivered within seven days. Importantly, we delivered completed ballots from voters to election officials in an average of less than two days.

2022 Post-Election Report at 6.

For each product used for Election Mail during FY 2022, please provide service performance data (percent on-time, variance, and average days to deliver) disaggregated by Election Mail and non-Election Mail. If any such data cannot be provided, please explain.

RESPONSE:

Confirmed.

- a. N/A
- b. In accordance with the Request, the table below provides service performance data for FY 2022 (10/1/2021 – 9/30/2022), disaggregated by Election Mail and non-Election Mail, based on volume that is in service performance measurement.

As further context, please note that the Post-Election Report excerpt referenced in the Request covers a different scope of mail and a different time period than the data provided below. The Post-Election Report excerpt is limited to ballot

³ United States Postal Service, 2022 Post-Election Analysis: Successfully Delivering the Nation's Election Mail During the 2022 Midterm Elections, available at <https://about.usps.com/what/government-services/election-mail/pdf/usps-2022-post-election-analysis.pdf> (2022 Post-Election Report).

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mail (inbound and outbound, including only those ballots that were properly identified as ballots using the correct electronic identifiers, and does not include many of the ballots that the Postal Service diverted from its processing network or otherwise handled outside of normal processes in an effort to accelerate delivery) and covers the period from September 8, 2022, through December 6, 2022, rather than FY 2022. The data below includes all the requested data for all Election Mail (not just ballots) and covers FY2022.

Mail Class (Election Mail)	Mail Shape	Avg Days To Deliver	Processing Score	Processing Score + 1	Processing Score + 2	Processing Score + 3
First-Class Mail	Letter	1.34	97.09%	98.83%	99.58%	99.82%
	Card	1.55	89.01%	96.17%	98.09%	98.83%
	Flat	1.45	74.96%	92.37%	97.19%	98.68%
First-Class Mail Total	All	1.38	95.53%	98.32%	99.30%	99.64%
Marketing Mail	Letter	2.04	97.70%	99.25%	99.75%	99.85%
	Flat	1.68	97.70%	98.81%	99.23%	99.28%
Marketing Mail Total	All	1.98	97.70%	99.19%	99.68%	99.77%
Total		1.83	97.14%	98.96%	99.58%	99.74%
Mail Class (non-Election Mail)	Mail Shape	Avg Days to Deliver	Processing Score	Processing Score +1	Processing Score +2	Processing Score +3
First-Class Mail	Letter	2.40	90.99%	94.92%	96.11%	96.59%
	Card	2.91	87.76%	93.85%	95.85%	96.72%
	Flat	2.73	84.64%	91.75%	94.44%	95.68%
First-Class Mail Total	All	2.44	90.68%	94.80%	96.06%	96.58%
Marketing Mail	Letter	2.66	91.32%	93.23%	94.02%	94.46%
	Flat	2.59	87.71%	90.17%	91.32%	91.95%
Marketing Mail Total	All	2.65	90.83%	92.82%	93.66%	94.12%
Total		2.55	90.76%	93.69%	94.71%	95.20%

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- 14.** Please refer to the 2022 General Election Mail Preparedness Memorandum⁴ issued to all Postal Service employees on September 26, 2022, which states:

Providing consistent guidance across the organization is critical to our success. Please refer to the 2022 Election Mail and Political Mail Guidebook available on Blue, to find up to date policies and procedures related to Election Mail and Political Mail.

Upon receipt of this memorandum, please take time to fully explain to your direct reports the policies and practices discussed above. A copy of this memorandum will be posted on the Postal Service Intranet at blue.usps.gov and usps.com/electionmail. Headquarters will distribute a Mandatory Stand-Up Talk to all employees discussing this memorandum.

Finally, as noted above, this is the first of three Election Mail guidance documents that we will be issuing. Look for additional memoranda on "Extraordinary Measures" and on "Postmarking" in the coming weeks.

- a. Please confirm that all materials described on page 3 of the September 26, 2022 Memorandum are available at <https://about.usps.com/what/government-services/election-mail>. If not confirmed, please provide such materials.
- b. Did any member of the Postal Service leadership team⁵ provide any written instructions to field employees regarding Election Mail during FY 2022, whether relating to primary, general, or special election, that are not available at <https://about.usps.com/what/government-services/election-mail>? If so, please provide such materials.

RESPONSE:

- a. Not confirmed. Please see the 2022 Election Mail and Political Mail Guidebook attached to this response set.
- b. No.

⁴ United States Postal Service, 2022 General Election Mail Preparedness Memorandum, September 26, 2022, at 3, available at <https://about.usps.com/what/government-services/election-mail/pdf/2022-general-election-mail-preparedness-memorandum.pdf> (September 26, 2022 Memorandum).

⁵ See USPS Leadership Team, available at <https://about.usps.com/who/leadership/hq-org.pdf>.

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- 15.** Please refer to the Postal Service memorandum issued to all Postal Service employees on September 29, 2022, with the subject 2022 General Election Extraordinary Measures Memorandum regarding the 2022 general election.⁶
- a. Please provide the total costs of the extraordinary measures described in the September 29, 2022 Memorandum. If total cost data are not available, please estimate the total costs of such extraordinary measures and explain the basis for the estimate.
 - b. Please provide the total work hours associated with the extraordinary measures described in the September 29, 2022 Memorandum. If total work hours data are not available, please estimate the total work hours associated with such extraordinary measures and explain the basis for the estimate.

RESPONSE:

- a-b. By their nature, ballots processed using extraordinary measures are not tracked and as a consequence we are unable to provide or accurately estimate costs or work hours associated with the use of extraordinary measures, although, given that the extraordinary measures are focused on ballot mail only, and are in effect for a short period of time (some authorized for only a couple of days immediately around the election), the costs and work hours are not likely to be significant.

⁶ United States Postal Service, 2022 General Election Extraordinary Measures Memorandum, September 29, 2022 (September 29, 2022 Memorandum), available at <https://about.usps.com/what/government-services/election-mail/pdf/2022-general-election-extraordinary-measures.pdf> (September 29, 2022 Memorandum).